

United States District Court
Southern District of New York

SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,

v.

DARRYL A. GOLDSTEIN and
CHRISTOPHER L. O'DONNELL,
Defendants.

ECF CASE
07 CV 11275 (JGK-JCF)

**PLAINTIFF'S NOTICE OF MOTION FOR ADMISSION
PRO HAC VICE OF Jordan A. Thomas, Esq.**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, upon the annexed Affidavit of Robert B. Blackburn and the Certificate of Good Standing , filed herewith, Plaintiff Securities and Exchange Commission moves this Court for an order pursuant to Rule 7 of the Federal Rules of Civil Procedure and Local Civil Rule 1.3(c) admitting Jordan A. Thomas to practice before this Court *pro hac vice* as counsel of record for and to represent Plaintiff in this action.

Dated: January 3, 2008
New York, New York

Respectfully submitted,

By:



Robert B. Blackburn (RB-1545)

Attorney for Plaintiff

Securities and Exchange Commission

1/3/08
WDA

United States District Court
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Motion
To Admit Counsel
Pro Hac Vice

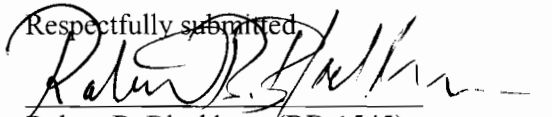
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Jordan A. Thomas
Firm Name: Securities and Exchange Commission
Address: 100 F St., N.E.
City/State/Zip: Washington, D.C. 20549-4010
Phone Number: (202) 551-4475
Fax Number: (202) 772-9245
Email: ThomasJA@SEC.Gov

Mr. Thomas is a member in good standing of the Bar of the Court of Appeals of the District of Columbia.

There are no pending disciplinary proceedings against Mr. Thomas in any State or Federal court, to the best of my knowledge.

Dated: January 3, 2008
City, State: New York, NY

Respectfully submitted,

Robert B. Blackburn (RB-1545)
For plaintiff
Securities and Exchange Commission
Address: 3 World Financial Center
City/State/Zip: New York, NY 10281-1022
Phone Number: (212) 336-1050
Fax Number: (212) 336-1317
Email: BlackburnR@SEC.Gov

United States District Court
Southern District of New York

SECURITIES AND EXCHANGE COMMISSION,
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Affidavit of
Robert B. Blackburn
In Support of Motion
To Admit Counsel *Pro Hac Vice*

State of New York)
) ss:
County of New York)

Robert B. Blackburn, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiff Securities and Exchange Commission (the "SEC") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the SEC's motion to admit Jordan A. Thomas as counsel *pro hac vice* to represent plaintiff SEC in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1972. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jordan A. Thomas at least since July 2004.
4. Mr. Thomas is an attorney in the Trial Unit, Division of Enforcement, in the Home Office of the SEC.
5. I have found Mr. Thomas to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure, the Federal Rules of Evidence and the SDNY Local Rules.
6. Accordingly, I am pleased to move the admission of Jordan A. Thomas, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Jordan A. Thomas, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jordan A. Thomas, *pro hac vice*, to represent Plaintiff SEC in the above captioned matter, be granted.

Dated: January 3, 2008

City, State: New York, NY

Notarized:

Anna M. Tirado

ANNA M. TIRADO
NOTARY PUBLIC, State of New York
No. 01T14727674
Qualified in Kings County
Commission Expires Jan. 31, 2010

Respectfully submitted,

Robert B. Blackburn

Robert B. Blackburn (RB-1545)

For plaintiff

Securities and Exchange Commission

Exhibit A

To

Affidavit of Robert B. Blackburn

In Support of Motion to Admit Counsel *Pro Hac Vice*

United States District Court
Southern District of New York

SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,

v.

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Order for Admission
Pro Hac Vice
On Written Motion

Upon the motion of Robert B. Blackburn attorney for plaintiff Securities and Exchange Commission and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Jordan A. Thomas
Firm Name:	Securities and Exchange Commission
Address:	100 F St., N.E.
City/State/Zip:	Washington, D.C. 20549-4010
Phone Number:	(202) 551-4475
Fax Number:	(202) 772-9245
Email:	ThomasJA@SEC.Gov

is admitted to practice *pro hac vice* as counsel for plaintiff Securities and Exchange Commission in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Since this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. As provided in the current *District Court Fee Schedule and Related Information* (Issued in accordance with 28 U.S.C. § 1914 (b)) no fee is required for this motion for admission *pro hac vice* since it is a "service[s] rendered on behalf of the United States."

Dated: January __, 2008
City, State: New York, NY

Hon. John G. Koeltl
United States District Judge



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

Jordan A. Thomas

was on the 8th day of November, 1996

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
December 3, 2007.

GARLAND PINKSTON, JR., CLERK

By: Christopher C. Dip
Deputy Clerk

United States District Court
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Proof of Service of
Motion To Admit Counsel
Pro Hac Vice

I, Robert B. Blackburn, hereby certify that, on January 3, 2008, I caused to be served a copy of the following documents:

- The Notice of plaintiff SEC's Motion for the Admission of Jordan A. Thomas *Pro Hac Vice*,
- The SEC's Motion for the Admission of Jordan A. Thomas *Pro Hac Vic*,
- The Affidavit of Robert B. Blackburn supporting said motion,
- Certificate of Good Standing for Jordan A. Thomas,
- A proposed Order for the Admission of Jordan A. Thomas *Pro Hac Vice*,
- A letter to Judge Koeltl transmitting courtesy copies of aforesaid papers,

by Federal Express overnight mail, to

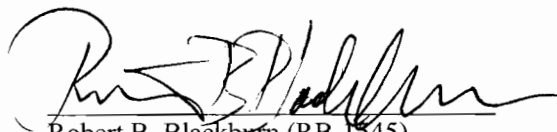
Nancy R. Grunberg, Esq.
Treazure Johnson, Esq.
Venable LLP
575 7th Street, N.W.
Washington, D.C. 20004-1601

Counsel for defendant Darryl A. Goldstein, and

Susan E. Brune, Esq.
Nina A. Beattie, Esq.
Brune & Richard LLP
80 Broad Street
New York, N.Y. 10004

Counsel for defendant Christopher L. O'Donnell.

Dated: January 3, 2008
New York, N.Y.



Robert B. Blackburn (RB-1545)
For plaintiff
Securities and Exchange Commission